

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION No.: 1:04-CV-11033

LIDUVINA BOSSELAAR,)
Plaintiff)
)
vs.)
)
THE UNITED STATES OF AMERICA, et al.,)
Defendants)

MOTION TO WITHDRAW

Attorney Matthew P. Albanese, and any and all attorneys associated with Colucci, Colucci, Marcus & Flavin, P.C., who have entered their appearance on behalf of the Plaintiff, respectfully move to withdraw their appearances on behalf of the Plaintiff in the above-entitled action.

As grounds therefore, the undersigned counsel states the following:

1. In May of 2003, Colucci, Colucci & Marcus, P.C., undertook representation of the Plaintiff's potential claim;
2. A Contingent Fee Agreement was sent to the plaintiff, to be signed and returned. This Contingent Fee Agreement has never been returned to our office;
3. A Complaint, regarding this matter, was filed on September 8, 2004 to preserve the statute for the benefit of the plaintiff;
4. To date, this firm has been unable to establish contact with the plaintiff, a non-United States citizen, living in the Netherlands;

WHEREFORE, the undersigned counsel pray that this Honorable Court grant this Motion to Withdraw as counsel of record for the Plaintiff in this action.

Liduvina Bosselaar

By Her Attorneys,

COLUCCI, COLUCCI, MARCUS &
FLAVIN, P.C.

/s/ Dino M. Colucci

Dino M. Colucci, Esq. (BBO#552331)
Matthew P. Albanese, Esq. (BBO# 653245)
424 Adams Street
Milton, MA 02186
(617) 698-6000

Assented to:

DEFENDANTS

THE UNITED STATES Of AMERICA, et al.,

By their attorneys,

/s/ Mark T. Quinlivan

Mark T. Quinlivan
Assistant U.S. Attorney
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3606

Dated: August 9, 2006